

EXHIBIT C

From: Gabriel Soledad <gabrielsonedad@quinnemanuel.com>

Date: Thursday, September 7, 2023 at 2:12 PM

To: Carlos Sires <csires@bsfillp.com>

Cc: Ward, Daniel V. <Daniel.Ward@ropesgray.com>, Michael Aleo <aleo@inn-law.com>, Brooke Alexander <balexander@BSFLLP.com>, Ana Carolina Varela <Avarela@bsfillp.com>, Nicholas Hoy <nicholashoy@quinnemanuel.com>, Valerie Ramos <valerieramos@quinnemanuel.com>

Subject: Re: Discovery meet-and-confer

Carlos: Thanks, please feel free to send an invite for tomorrow. We'll do our best to be prepared to address all of the issues you raise on the call but we may have to take some of them back given that you still haven't identified them. We reiterate our requests that you provide us with your search protocol and let us know in advance your positions on the outstanding questions. We intentionally raised these points well in advance of the meet and confer so that we could know your positions on them and try to resolve any disputes (and, if we can't, raise the disputes in a timely fashion with the Court).

Your suggestion that AIC's search protocol is somehow lacking is clearly manufactured and not well taken. We made clear what we were intending to review and produce more than three weeks ago. This included reviewing a document set containing well over 1 million documents, as you know. If you had an issue with what we planned to do, you should not have waited until the day of the substantial completion deadline to raise it.

As for your request for an extension of the substantial completion deadline, we note that under the Scheduling Order, "[a]bsent an emergency, any request for an extension or adjournment shall be made at least forty-eight hours prior to the deadline or scheduled appearance." We presume that you knew well in advance of Tuesday, when we raised it (once again), that you were not prepared to meet the substantial completion deadline. Nevertheless, as a courtesy, we are prepared to consent to your motion to extend the schedule by four weeks, provided that all interim dates should remain the same except for the deadline for identifying the first five depositions, which should also move by four weeks.

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